

Case Name: Funds v. Spray in Place Solutions, LLC, et ano. Case Number: 1:24 CV - 2568 ( KAM ) (PK)**PROPOSED DISCOVERY PLAN/SCHEDULING ORDER**

	DONE	NOT APPLICABLE	DATE
<b>A. ACTIONS REQUIRED <i>BEFORE</i> THE INITIAL CONFERENCE</b>			
1. Rule 26(f) Conference held	✓		
2. Rule 26(a)(1) disclosures exchanged			11/3/2025
3. Requested:			
a. Medical records authorization		×	
b. Section 160.50 releases for arrest records		×	
c. Identification of John Doe/Jane Doe defendants		×	
4. Procedures for producing Electronically Stored Information (ESI) discussed		×	
5. Confidentiality Order to be submitted for court approval (see Standing Confidentiality Order on the Chambers website)		×	
<b>B. SETTLEMENT PLAN</b>			
1. Plaintiff to make settlement demand			11/3/2025
2. Defendant to make settlement offer			11/14/2025
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date for mediation to be completed)			Ds willing; Ps confirming
4. Settlement Conference (proposed date)			failing mediation
<b>C. PROPOSED DEADLINES</b>			
1. Motion to join new parties or amend pleadings			11/30/2025
2. Initial documents requests and interrogatories			11/30/2025
3. All fact discovery to be completed (including disclosure of medical records)			3/2/2026
4. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed			3/6/2026

5. Expert discovery (only if needed)		Check here if not applicable <input checked="" type="checkbox"/>	
Plaintiff expert proposed field(s) of expertise:	N/A		
Defendant expert proposed field(s) of expertise:	N/A		
	<b>DONE</b>	<b>NOT APPLICABLE</b>	<b>DATE</b>
a. Affirmative expert reports due		X	
b. Rebuttal expert reports due		X	
c. Depositions of experts to be completed		X	
6. Completion of ALL DISCOVERY (if different from C.3)		X	
7. Joint status report certifying close of ALL DISCOVERY and indicating whether dispositive motion is anticipated		X	
8. If any party seeks a <b>dispositive motion</b> , date to (a) file request for pre-motion conference (if required), or (b) file briefing schedule for the motion			3/31/2026
9. Proposed Joint Pre-Trial Order due (if no dispositive motion filed)			3/31/2026
<b>D. CONSENT TO MAGISTRATE JUDGE JURISDICTION</b>			
1. All parties consent to Magistrate Judge jurisdiction for dispositive motion?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
2. All parties consent to Magistrate Judge jurisdiction for trial?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY</b>			
1. Motion for collective action certification in FLSA cases		X	
a. Response due		X	
b. Reply due		X	
2. Motion for Rule 23 class certification		X	
a. Response due		X	
b. Reply due		X	

**This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.**

SO ORDERED:

\_\_\_\_\_  
**PEGGY KUO**  
 United States Magistrate Judge

\_\_\_\_\_  
**Date**